

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

1. The allegations of paragraph 1 are admitted;
2. Debtors are without sufficient information to admit or deny the allegations of paragraph 2, and therefore the allegations are denied;
3. The allegations of paragraph 3 are admitted;
4. The allegations of paragraph 4 are admitted;
5. The allegations of paragraph 5 are admitted;
6. The allegations of paragraph 6 are denied; By way of information, Debtors' Schedule F has a listed claim of \$5,564.00;
7. Debtors are without sufficient information to admit or deny the allegations of paragraph 7, and therefore the allegations are denied;

8. Debtors are without sufficient information to admit or deny the allegations of paragraph 8, and therefore the allegations are denied;
9. Debtors are without sufficient information to admit or deny the allegations of paragraph 9, and therefore the allegations are denied;
10. Debtors are without sufficient information to admit or deny the allegations of paragraph 10, and therefore the allegations are denied;
11. Debtors are without sufficient information to admit or deny the allegations of paragraph 11, and therefore the allegations are denied;
12. Debtors are without sufficient information to admit or deny the allegations of paragraph 12, and therefore the allegations are denied;
13. Debtors are without sufficient information to admit or deny the allegations of paragraph 13, and therefore the allegations are denied;
14. Debtors are without sufficient information to admit or deny the allegations of paragraph 14, and therefore the allegations are denied;
15. Debtors are without sufficient information to admit or deny the allegations of paragraph 15, and therefore the allegations are denied;
16. Debtors are without sufficient information to admit or deny the allegations of paragraph 16, and therefore the allegations are denied;
17. Debtors are without sufficient information to admit or deny the allegations of paragraph 17, and therefore the allegations are denied;
18. Debtors are without sufficient information to admit or deny the allegations of paragraph 18, and therefore the allegations are denied;
19. Paragraph 19 asserts a mixture of legal and factual allegations; To the extent that the allegations are factual, Debtors are without sufficient information to admit or deny the allegations of paragraph 19, and therefore the allegations are denied; To the extent that the paragraph is a statement of law, paragraph 19 is denied;
20. Debtors are without sufficient information to admit or deny the allegations of paragraph 20, and therefore the allegations are denied;
21. Debtors are without sufficient information to admit or deny the allegations of paragraph 21, and therefore the allegations are denied;
22. Debtors are without sufficient information to admit or deny the allegations of paragraph 22, and therefore the allegations are denied;
23. Debtors are without sufficient information to admit or deny the allegations of

paragraph 23, and therefore the allegations are denied;

24. Debtors are without sufficient information to admit or deny the allegations of paragraph 24, and therefore the allegations are denied;
25. Debtors are without sufficient information to admit or deny the allegations of paragraph 25, and therefore the allegations are denied;
26. Debtors are without sufficient information to admit or deny the allegations of paragraph 26, and therefore the allegations are denied;
27. Debtors are without sufficient information to admit or deny the allegations of paragraph 27, and therefore the allegations are denied;
28. Debtors are without sufficient information to admit or deny the allegations of paragraph 28, and therefore the allegations are denied;
29. Debtors are without sufficient information to admit or deny the allegations of paragraph 29, and therefore the allegations are denied;
30. Debtors are without sufficient information to admit or deny the allegations of paragraph 30, and therefore the allegations are denied;
31. Debtors are without sufficient information to admit or deny the allegations of paragraph 31, and therefore the allegations are denied;
32. Paragraph 32 is the Plaintiff's statement of law and contains no factual allegations and thus requires no response; To the extent that a response is required, Debtors are without sufficient information to admit or deny the allegations of paragraph 32, and therefore the allegations are denied;
33. Debtors are without sufficient information to admit or deny the allegations of paragraph 33, and therefore the allegations are denied;
34. Debtors are without sufficient information to admit or deny the allegations of paragraph 34, and therefore the allegations are denied;
35. Debtors are without sufficient information to admit or deny the allegations of paragraph 35, and therefore the allegations are denied;
36. Debtors are without sufficient information to admit or deny the allegations of paragraph 36, and therefore the allegations are denied;
37. Debtors are without sufficient information to admit or deny the allegations of paragraph 37, and therefore the allegations are denied;
38. Debtors are without sufficient information to admit or deny the allegations of paragraph 38, and therefore the allegations are denied;

39. Debtors are without sufficient information to admit or deny the allegations of paragraph 39, and therefore the allegations are denied;
40. Debtors reserve the right to assert at trial any and all properly provable defenses that may become apparent through discovery or otherwise and further reserve the right to amend the Answer if it be so advised.

WHEREFORE, Debtors respectfully request that the Court:

- i. Dismiss the complaint with prejudice;
- ii. Grant Debtors costs and expenses, including attorneys fees, incurred in this action; and
- iii. Grant such other and further relief as the Court deems just and proper

December 19th, 2012

Respectfully submitted,

FRANCIS RANDOLPH WARREN; AND
JANET BROWN WARREN

/s/ Andrew S. Chen, Esq. (VSB #79562)
Counsel for the Debtors

Andrew S. Chen, Esq.
CounselorChen, PLLC
113 Granite Springs Rd.
Richmond, VA 23225
Office: (804) 277-9381
Fax: (804) 977-1820
counselorchen@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 2012, a true copy of the foregoing pleading is being filed with the Bankruptcy Court's Electronic Case Filing System, which will send a Notice of Electronic Filing (NEF) to all creditors and parties-in-interest who are included in the Bankruptcy Court's ECF e-mail notification system, and is also being sent via electronic mail, to the following:

Daniel Ross, Esq. (VSB #79727)
DanielR@w-legal.com
2001 Western Ave. Suite 400
Seattle, WA 98121

/s/ Andrew S. Chen, Esq.
Counsel for the Debtors